

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.
Keimonie Stokes

Case: 2:24-mj-30179
Assigned To : Unassigned
Assign. Date : 5/8/2024
CMP: USA v STOKES (MAW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 1, 2024, May 7, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C § 2251(a)	Sexual exploitation of children.
18 U.S.C § 2252A(a)(1)	Transportation of child pornography.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: May 8, 2024

City and state: Detroit, Michigan

Matthew M. Smith
Complainant's signature

Matthew Smith, Special Agent- HSI
Printed name and title

Kim G Altman
Judge's signature

Hon. Kimberly G. Altman, United States Magistrate Judge
Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR CRIMINAL
COMPLAINT AND ARREST WARRANT**

I, Matthew Smith, a special agent with Homeland Security Investigations, being duly sworn, depose and state as follows:

INTRODUCTION

1. I have been employed as a special agent (SA) with Homeland Security Investigations (HSI) since April 2015 and am assigned to the Cyber Group with HSI Detroit since September 2021 and the Michigan State Police (MSP) Internet Crimes Against Children (ICAC) taskforce since January 2022. While employed by HSI, I have investigated federal criminal violations related to child exploitation and child pornography. I have gained experience through the HSI Special Agent Training Academy Program and everyday work related to conducting these types of investigations. I have successfully completed the Basic Computer Evidence Recovery Training (BCERT) at the Federal Law Enforcement Training Center (FLETC), Advanced Computer Evidence Recovery Training (ACERT) at the HSI Cyber Crimes Center and the Cyber Crimes Center Mobile and Cellular Device Data Extraction course. I have received training in child pornography and child exploitation and have had the opportunity to observe and review examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. Moreover, I am a federal law enforcement officer who is engaged

in enforcing the criminal laws, including 18 U.S.C. §§ 2251, 2252, and 2252A, and I am authorized by law to request an arrest warrant.

2. This affidavit is made in support of an application for a criminal complaint and arrest warrant for Keimonie STOKES for violations of Title 18, United States Code, §§ 2251(a) (sexual exploitation of children), and 2252A(a)(1) (transportation of child pornography).

3. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information made available to me by other law enforcement professionals. These facts are provided for the sole purpose of establishing probable cause for the issuance of a criminal complaint and arrest warrant; therefore, this affidavit does not necessarily contain all information uncovered during this investigation. I have set forth only the facts that I believe are necessary to establish probable cause for an arrest warrant for Keimonie STOKES.

PROBABLE CAUSE

4. On May 1, 2024, the Michigan State Police (MSP) Internet Crimes Against Children Taskforce (ICAC) received a National Center for Missing and Exploited Children (NCMEC) tip. The NCMEC tip was submitted by Google and advised that a user later identified as STOKES uploaded nine (9) videos of child sexually abusive material (CSAM) to a YouTube account using a Gmail account listed as keimoniesX@XXXXcom. The tip also included a second email that was

associated with that account, which was keimoniastokesX@XXXX.com. Two of the files are described below:

- File name: nDpXXXXXXXXXX.mp4

This video depicts a prepubescent girl, approximately three to six years of age, on what appears to be a bed, completely nude and beside a towel. The prepubescent girl is on her knees with her face into the bed with her hands behind her back. The camera pans over behind the girl's buttocks and focuses on her anus and vagina. The camera then zooms in on the prepubescent girl's anus, where it appears semen is dripping out of her anus. What appears to be an African American adult male's hand touches and moves the girl's buttocks. The prepubescent girl appears to be unconscious for the entirety of the video. This video is approximately 1 minute 18 seconds in length.

- File name: jFXXXXXXXXXX.mp4

This video depicts a prepubescent girl, approximately three to six years of age, on what appears to be a bed, completely nude and beside a towel. The girl is laying on her stomach and appears to be the same girl from the prior video. The video shows what appears to be a male's hand placing the video camera on the ground multiple times to show the girl in different

positions. The girl is unconscious the entire time, and the camera repeatedly zooms in on her anus.

5. Of the nine total videos, eight (8) videos appear to depict the same prepubescent girl between the ages of 3 to 6 described in the two videos above. One (1) video depicts a prepubescent girl who appears to be under the age of 3. In addition, in one of the videos, the suspect is seen wearing distinctive tan/brown-colored footwear, appearing to be Crocs-brand shoes, with multiple colors and a blue strap going over the top. The suspect also has a black line on the nail of the left thumb and a tattoo on the left forearm.

6. Following the tip, a federal summons was submitted to T-Mobile requesting subscriber information for the IP Address used to upload the CSAM videos. The subscriber information came back to an individual (Adult01) known to law enforcement. Further, T-Mobile advised phone (313) XXX-8579 is also linked to the upload IP address.

7. On May 7, 2024, law enforcement interviewed Adult01, who identified the distinctive tan/brown shoes the suspect was wearing in one of the videos as belonging to STOKES. STOKES' name also matches the [keimoniesX@XXXX.com](#) and [keimoniestokesX@XXXX.com](#) accounts associated with the uploaded CSAM videos in the original tip. .

8. An emergency ping of the suspect phone (313) XXX-8579 (associated with IP address) placed the phone in the area of STOKES' mother's address in Detroit ("Residence"), with a 13-meter accuracy STOKES' mother's Bridge Card listed address is the Residence

9. On May 7, 2024, a residential search warrant issued by the Michigan 16th District Court was served at the Residence. STOKES was present and arrested. STOKES had a black line on his left thumbnail that matched the suspect's in the CSAM video described above. STOKES also had a tattoo seen on his left forearm that resembled the tattoo seen in on the suspect in one of the CSAM described above.

10. In addition, agents identified an area upstairs in the residence as the scene of several of the videos due to the distinct pattern of the couch backrest cushions as well as the rug and layout of the room. Agents collected two pillows that were also identified from one of the videos and were found in a separate upstairs bedroom. Agents collected a pair of "cinnamon toast crunch" Crocs that were found in the garbage can located on the curtilage of the residence right outside the front door.

III. CONCLUSION

4. I respectfully submit that there is probable cause to believe that Keimonie STOKES violated 18 U.S.C. §§ 2251(a) and 2252A(a)(1), which criminalize the sexual exploitation of children and the transportation of child pornography, and request that the Court authorize an arrest warrant in this matter.

Respectfully submitted,

Matthew M. Smith

Matthew Smith
Special Agent
Homeland Security Investigations

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Hon. Kimberly G. Altman
United States Magistrate Judge

Date: May 8, 2024